REMARKS

The application includes claims 7-34 prior to entering this amendment.

The examiner rejects claims 7-34 under 35 U.S.C. § 112.

The examiner rejects claims 7-34 under 35 U.S.C. § 103(a) as being unpatentable over the combination of Takahashi (U.S. Patent 6,665,439) and further in view of Dube et al. (U.S. Patent 6,782,143).

The applicant amends claims 7 and 18. The applicant cancels claims 8-9, and 19-20.

The application remains with claims 7, 10-18, and 21-34 after this amendment.

The applicant adds no new matter and requests reconsideration.

Withdrawal of Final Rejection

The applicants request that the examiner withdraw the finality of this rejection. The applicants remind that examiner that:

"The examiner may withdraw the rejection of finally rejected claims. If new facts or reasons are presented such as to convince the examiner that the previously rejected claims are in fact allowable or patentable in the case of reexamination, then the final rejection should be withdrawn. Occasionally, the finality of a rejection may be withdrawn in order to apply a new ground of rejection." MPEP 706.07(e) Withdrawal of Final Rejection, General, ¶2.

As we describe in further detail below, the Examiner should withdraw the rejection of independent claims 7 and 18 for the following reasons:

- Claim 7 has been amended with the elements of dependent claims 8 and 9. Claim 18 has been similarly amended.
- Claim 8 introduced the group of image features as one or more of a ramp, an edge, a segment, and noise.
- Claim 9 introduced that the targeted image feature is changed from one of the group in claim 8 to another of the group of claim 8.
- The combination of Takahashi and Dube does not suggest more than edge detection. Furthermore, the combination does not suggest switching from edge detection to ramp, segment, or noise detection.

Accordingly, combination of Takahashi and Dube does not teach or suggest each and every element of independent claims 7 and 18.

Furthermore, claim 9 included the subject matter of parent claims 7 and 8. Elements of claims 8 and 9 were added into claims 7 and 18. Since claim 9 was present in the application prior to the current final office action and the Examiner performed a through search of the prior art to reject claim 9, a further search is not required nor has new matter been added. In addition, the amendments place the application in better form for appeal and no additional claims have been added.

Accordingly, the applicants request the examiner withdraw the finality of the rejection.

Claim Rejections - 35 U.S.C. § 112

The Examiner rejected claims 7-34 under 35 U.S.C. § 112 for failing to comply with the written description requirement. The Examiner rejected claims 7-34 due to the use of the word "occurrences."

Claim 7, for example, includes "identifying occurrences of a targeted image feature in a pixel array." As described in the application, a feature in an image can be a ramp, an edge, a level segment, noise, a spike, or the like for example. See Application, p. 6, l. 25 – p. 7, l. 2. One of these image features can be a targeted image feature. The image data is examined to find the targeted image feature. Application, p. 7, ll. 4-18. Once data is found matching the targeted image feature, that data can be referred to as an occurrence of the targeted image feature.

One skilled in the art would understand that in an image, there can be multiple occurrences of a particular image feature. For example, an image may have multiple edges. Thus, there are multiple occurrences of an edge in the image data. The term occurrence is used to distinguish one matching set of data from another. The Applicant requests that the Examiner withdraw the rejection of claims 7, 10-18, and 21-34.

Claim Rejections - 35 U.S.C. § 103

Claim 7 has been amended with the elements of claims 8 and 9. Cancelled claim 8 recited that "the group of image features comprises one or more of a ramp, an edge, a segment, and noise." Cancelled claim 9 recited that "the feature extractor is adapted to be programmable

such that the targeted image feature is changed from a first one of the group of image features to a second one of the group of image features."

Since claim 8 introduced the group as one or more of a ramp, an edge, a segment, and noise and claim 9 introduced changing the targeted image feature from a first one of the group to a second one of the group, claim 7 as amended now requires that the feature extractor can be programmed to change from one of a ramp, an edge, a segment, and noise to another of a ramp, an edge, a segment, and noise.

The Examiner cited an edge from Takahashi as the first image feature. With respect to claim 9, the Examiner cited "changes/variations of color values of different group of images" as the second of the group of image features.

First, in claim 7, the attribute that is changed is not a color value. Nor is the change to a different group of images. Rather, the attribute that is changed is the targeted image feature. In other words, the image feature that is searched for is changed. For example, first the feature extractor may populate a feature table by identifying occurrences of edges. Then the feature extractor can be changed to identify occurrences of ramps.

Second, the targeted image feature must be able to be changed into one of the group from claim 8. That is, the targeted image feature must be changed to one of a ramp, an edge, a segment, and noise." If the cited references do not describe changing to one of these particular image features, then the cited reference to no teach or suggest each and every element of claim 7 as amended. In other words, even if the targeted image feature can be changed, it must be capable of being changes into an image feature from the listed group.

The sections cited by the Examiner in Takahashi do not describe anything more than edges detection. For example, col. 12, ll. 59-67 of Takahashi describes the purpose of the edge detection to detect streets, buildings, etc. Col. 9, ll. 59-61 of Takahashi is the figure reference for FIG. 21. Col. 22, ll. 46-65 of Takahashi describes FIG. 21. However, this is nothing more than a stage in the edge detection. The result is shown in FIG. 22. See col. 22, ll. 61-65 of Takahashi in particular. Thus, the focus of Takahashi is on edge detection. See Takahashi, Abstract.

The addition of Dube to Takahashi does not cure the deficiencies of Takahashi. Dube focuses on interpolation. Edge identification is used in the interpolation. See Dube, Abstract. Even assuming for the sake of argument that Dube describes other image features including the

image features of the group in claim 7, there is not suggestion of changing a feature extractor to identify occurrences of ramps, segments, or noise, instead of edges.

Accordingly, the Applicant respectfully requests that the Examiner withdraw the rejection of claims 7, 18, and dependent claims 10-17, and 21-34.

Conclusion

For the foregoing reasons, reconsideration and allowance of claims 7, 10-18, and 21-34 of the application as amended is requested. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

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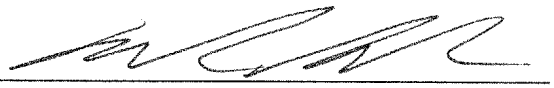

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